

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, et al.,

Plaintiffs

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-CV-00259
DCG-JES-JVB
(Consolidated Action: Lead Case)

**PRIVATE PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF IN
OPPOSITION TO LEGISLATORS' MOTION TO QUASH AND FOR LEAVE TO
EXCEED PAGE LIMIT**

Private Plaintiffs in these consolidated cases¹ respectfully move this Court for leave to file their Brief in Opposition to Legislators' Motion to Quash or Modify Deposition Subpoenas and Motion for Protective Order, ECF No. 259 (the "Motion to Quash"). Private Plaintiffs' Brief in Opposition to the Motion to Quash is attached as Exhibit A and Proposed Order is attached as Exhibit B. Additionally, Private Plaintiffs seek leave to file a Brief in excess of ten (10) pages, pursuant to L.R. CV-7(d)(3). Counsel for Legislators have stated that they do not oppose this Motion.

The Motion to Quash challenges subpoenas that the United States served on Texas State Representatives Ryan Guillen, Brooks Landgraf, and John Lujan (collectively, "Legislators") on April 20, 2022 and May 3, 2022. Private Plaintiffs jointly served their own deposition subpoenas

¹ Private Plaintiffs are plaintiffs in each consolidated case, except for *United States v. Texas*, No. 3:21-cv-00299.

on Legislators on May 6, 2022, designating the same deposition dates as provided for in the United States' original subpoenas. These cases have been consolidated for discovery purposes, ECF No. 16, and Private Plaintiffs plan to question Legislators at their depositions. The Motion to Quash therefore implicates Private Plaintiffs' interests, and Private Plaintiffs respectfully request that the Court allow Private Plaintiffs to file the attached Brief in Opposition to the Motion to Quash.

Additionally, Private Plaintiffs seek leave to file a Brief in excess of ten (10) pages, for up to fifteen (15) pages, for sufficient opportunity to explain the factual and legal bases for their Opposition to Legislators' Motion to Quash. Granting this Motion will not prejudice any party. Counsel for Legislators have stated that they do not oppose this Motion.

CONCLUSION

For the forgoing reasons, Private Plaintiffs respectfully request that this Unopposed Motion for Leave be granted.

Dated: May 11, 2022

s/ Lindsey B. Cohan
Lindsey B. Cohan
Texas Bar No. 24083903
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000
lindsey.cohan@dechert.com

Jon Greenbaum*
Ezra D. Rosenberg*
Pooja Chaudhuri*
Sofia Fernandez Gold*
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street, Suite 900
Washington, DC 20005
(202) 662-8600
jgreenbaum@lawyerscommittee.org
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org
sfgold@lawyerscommittee.org

Neil Steiner*
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com

Robert Notzon
Texas Bar No. 00797934
THE LAW OFFICE OF ROBERT
NOTZON
1502 West Avenue
Austin, Texas 78701
(512) 474-7563
robert@notzonlaw.com

Gary Bledsoe
Texas Bar No. 02476500
THE BLEDSOE LAW FIRM PLLC
6633 Highway 290 East #208
Austin, Texas 78723-1157
(512) 322-9992
gbledsoe@thebledsoelawfirm.com
*Attorney only as to Texas NAACP's claims
related to Texas state senate and state house
plans*

Janette M. Louard
Anthony P. Ashton
Anna Kathryn Barnes
NAACP OFFICE OF THE GENERAL
COUNSEL

4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-577
jlouard@naacpnet.org
aashon@naacpnet.org
abarnes@naacpnet.org
Attorneys appearing of counsel

**Admitted pro hac vice*

*ATTORNEYS FOR THE TEXAS STATE
CONFERENCE OF NAACP*

s/ Nina Perales

Nina Perales
Texas Bar No. 24005046
Samantha Serna
Texas Bar No. 24090888
Fátima Menendez
Texas Bar No. 24090260
Kenneth Parreno*
Massachusetts Bar No. 705747
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
(210) 224-5476

**Admitted pro hac vice*

ATTORNEYS FOR LULAC PLAINTIFFS

s/ Renea Hicks

Renea Hicks
Texas Bar No. 09580400
LAW OFFICE OF MAX RENEH HICKS
P.O. Box 303187
Austin, Texas 78703-0504
(512) 480-8231
rhicks@renea-hicks.com

Abha Khanna*
ELIAS LAW GROUP LLP
1700 Seventh Ave, Suite 2100
Seattle, WA 98101

(206) 656-0177
akhanna@elias.law

Aria C. Branch*
David R. Fox*
ELIAS LAW GROUP LLP
10 G Street NE, Suite 600
Washington, D.C. 20002
(202) 968-4490
abbranch@elias.law
dfox@elias.law

Kevin J. Hamilton*
PERKINS COIE
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
(206) 359-8000
khamilton@perkinscoie.com

*Admitted *pro hac vice*

*ATTORNEYS FOR VOTO LATINO
PLAINTIFFS*

s/ George Quesada
George (Tex) Quesada
Texas Bar No. 16427750
Sean J. McCaffity
Texas Bar No. 24013122
SOMMERMAN, MCCAFFITY,
QUESADA & GEISLER, L.L.P.
3811 Turtle Creek Boulevard, Suite 1400
Dallas, Texas 75219-4461
(214) 720-0720
quesada@textrial.com
smccaffity@textrial.com

Joaquin Gonzalez
Texas Bar No. 24109935
Attorney at Law
1055 Sutton Dr.
San Antonio, TX 78228
jgonzalez@malc.org

*ATTORNEYS FOR MEXICAN AMERICAN
LEGISLATIVE CAUCUS PLAINTIFFS*

s/ Martin Golando

Martin Golando
Texas State Bar No. 24059153
Attorney at Law
2326 W. Magnolia
San Antonio, Texas 78201
(210) 471-1185
Martin.Golando@gmail.com

*ATTORNEY FOR TREY MARTINEZ
FISCHER*

s/ Chad W. Dunn

Chad W. Dunn
Texas Bar No. 24036507
BRAZIL & DUNN
4407 Bee Caves Road
Building 1, Suite 111
Austin, TX 78746
(512) 717-9822
chad@brazilanddunn.com

Mark P. Gaber*
MARK P. GABER PLLC
P.O. Box 34481
Washington, DC 20043
(715) 482-4066
mark@markgaber.com

Jesse Gaines
Tex. Bar. No. 07570800
P.O. Box 50093
Fort Worth, TX 76105
(817) 714-9988
gainesjesse@ymail.com

Molly E. Danahy*
P.O. Box 26277
Baltimore, MD 21211
(208) 301-1202
danahy.molly@gmail.com

Sonni Waknin*
10300 Venice Blvd. # 204
Culver City, CA 90232

(732) 610-1283
sonniwaknin@gmail.com

*Admitted *pro hac vice*

ATTORNEYS FOR BROOKS PLAINTIFFS

s/ Noor Taj

Noor Taj*
PA State Bar No. 309594
Allison J. Riggs*
NC State Bar No. 40028
Hilary Harris Klein*
NC State Bar No. 53711
Mitchell Brown*
NC State Bar No. 56122
SOUTHERN COALITION FOR SOCIAL
JUSTICE
1415 West Highway 54, Suite 101
Durham, NC 27707
(919) 323-3380
noor@scsj.org
allison@southerncoalition.org
hilaryhklein@scsj.org
mittchellbrown@scsj.org

David A. Donatti
Texas Bar No. 24097612
Ashley Harris
Texas Bar No. 24078344
Thomas Buser-Clancy
Texas Bar No. 24123238
Andre I. Segura
Texas Bar No. 24107112
ACLU FOUNDATION OF TEXAS, INC.
P.O. Box 8306
Houston, TX 77288
(713) 942-8146
ddonnati@aclutx.org
aharris@aclutx.org
tbuser-clancy@aclutx.org
asegura@aclutx.org

Jerry Vattamala*
NY State Bar No. 4426458
Susana Lorenzo-Giguere*

NY State Bar No. 2428688
Patrick Stegemoeller*
N.Y. State Bar No. 5819982
ASIAN AMERICAN LEGAL DEFENSE
AND EDUCATION FUND
99 Hudson Street, 12th Floor
New York, NY 10013
(212) 966-5932
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org

*Admitted *pro hac vice*

*ATTORNEYS FOR FAIR MAPS
PLAINTIFFS*

s/ Gary Bledsoe
Gary Bledsoe
Texas Bar No. 02476500
THE BLEDSOE LAW FIRM PLLC
6633 Highway 290 East #208
Austin, Texas 78723-1157
Telephone: 512-322-9992
gbledsoe@thebledsoelawfirm.com

ATTORNEY FOR CONGRESSPERSONS

CERTIFICATE OF CONFERENCE

Counsel for Private Plaintiffs conferred with counsel for the Legislators in a good-faith attempt to resolve the subject matter of this Motion, and counsel for the Legislators indicated that they do not oppose this Motion.

/s/ Lindsey B. Cohan

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 11, 2022, the foregoing document was filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Lindsey B. Cohan